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8 *Attorneys for defendant TD Ameritrade, Inc.*

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UNITED STATES DISTRICT COURT
12
DISTRICT OF NEVADA

13 BRANDI CZERNIEWSKI, individually, as
14 Personal Representative of the Estate of Bruce
Schepens, as Trustee of the Bruce Schepens
Revocable Trust, and as Trustee of the Bruce
Schepens Separate Property Trust,

15 Plaintiff,

16 v.

17 KRISTINE KEPPEL, an individual, and
18 TD AMERITRADE, INC., a Foreign Corporation,
Defendants.

19 Case No. 2:18-cv-02078-KJD-VCF

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STIPULATION AND ORDER TO
STAY PENDING ARBITRATION

22 Defendant TD Ameritrade, Inc. (“TD Ameritrade”), and plaintiff Brandi Czerniewski,
individually, as Personal Representative of the Estate of Bruce Schepens, as Trustee of the
Bruce Schepens Revocable Trust, and as Trustee of the Bruce Schepens Separate Property Trust
("plaintiff"), collectively referred to as the "parties," by and through their respective
undersigned counsel, hereby stipulate and agree as follows:

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IT IS HEREBY STIPULATED that a Judgment was entered in this proceeding against
defendant Keppel on March 30, 2021;

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IT IS FURTHER STIPULATED that plaintiff's claims against defendant TD
Ameritrade will proceed to arbitration through the Financial Institution Regulatory Authority

1 ("FINRA"), and pursuant to the provisions of the Federal Arbitration Act, 9 U.S.C. § 1 *et. seq.*
2 (the "FAA");

3 **IT IS FURTHER STIPULATED** that plaintiff's claims against TD Ameritrade in this
4 proceeding shall be stayed pending resolution of the arbitration through FINRA pursuant to the
5 provisions of the FAA; and

6 **IT IS FURTHER STIPULATED** that all statutes of limitation and statutes of repose
7 applicable to all claims and potential claims by all parties against defendant TD Ameritrade that
8 arise out of the allegations in the plaintiff's complaint, including, without limitation, direct
9 claims, counter-claims, and cross-claims, are tolled during such stay.
10

11 Dated this 31st day of January, 2022.

Dated this 31st day of January, 2022.

12 HUTCHISON & STEFFEN, PLLC

SOLOMON DWIGGINS & FREER, LTD.

13 /s/ Joseph R. Ganley

/s/ Ross E. Evans

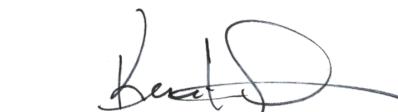
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20 Attorneys for plaintiff Brandi Czerniewski

21 **ORDER**

22 **IT IS SO ORDERED.**

23 Dated this 4th day of February, 2022.



24 DISTRICT COURT JUDGE KENT J. DAWSON
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1 Respectfully submitted by:

2 HUTCHISON & STEFFEN, PLLC

3 */s/ Joseph R. Ganley*

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